

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Request for Review of the	)	
	)	
Decision of the	)	<b>CC Docket No. 02-6</b>
Universal Service Administrative Company	)	<b>CC Docket No. 96-45</b>
	)	
By	)	<b>File No. _____</b>
	)	
Hamilton/Clermont Cooperative Association	)	
SPIN # 143024403	)	
Form 474 Invoice # 1414977 and 1413837	)	
Funding Request # 1796279, 1783340,	)	
<u>1856721, 1856675, 1781381, 1901218</u>	)	

To: The Federal Communications Commission

**REQUEST FOR WAIVER**

Hamilton/Clermont Cooperative Association (“HCCA”), through its undersigned counsel and pursuant to sections 1.3 and 54.719(c) of the Commission’s rules, 47 C.F.R. §§ 1.3, 54.719(c), respectfully requests review of the November 4, 2010, denial of HCCA’s request for reimbursement (the “Denial”) by the Schools and Libraries Division of the Universal Service Administrative Company (“USAC”), a copy of which is attached as Exhibit A. HCCA provides internet services to schools and libraries throughout central Ohio. The schools pay a discounted rate to HCCA, and HCCA submits a Form 474 for reimbursement. In the Denial, USAC denied reimbursement for two Form 474s (invoice numbers 1414977 and 1412827) on the ground that the Form 474s were five days late. As demonstrated below, since Funding Year 2008-2009, USAC repeatedly and persistently has demanded that HCCA produce substantial additional and

burdensome documentation for each and every Form 474 that it submits to USAC. The documentation USAC demands before it will approve reimbursement is not required by any Commission rule nor does it meet any need the Commission has identified. In its effort to comply with these numerous demands with limited internal resources, HCCA was five days late in submitting the Form 474 for the two invoices at issue. HCCA has made a good faith effort to comply with the Commission's rules and USAC's demands, and good cause exists to permit HCCA's *de minimis* delay in submitting the Form 474 at issue in this case. HCCA therefore respectfully requests the Commission to waive the Form 474 deadline for funding request numbers 1796279, 1783340, 1856721, 1856675, 1781381, 1901218 (the "FRNs"), and to fund the FRNs in the requested amount of \$55,013.17. HCCA also requests that the Commission direct USAC to cease and desist from the onerous invoicing document requests that it has imposed upon HCCA for two years.

## **I. FACTUAL BACKGROUND**

HCCA is a state-funded entity, established by the Ohio General Assembly to support statewide technology programs and initiatives and to promote innovative technologies, partnership arrangements, and cooperative purchasing agreements to help support the technology initiatives of the Ohio Education Computer Network and Ohio schools. Since 2002, HCCA has provided internet services to public and private schools throughout central Ohio, for which they have received E-Rate funding.

Beginning in 2008, USAC repeatedly and persistently—and without any stated basis for doing so—has requested substantial additional documentation in support of the Form 474s, even though that documentation is not required under the Commission's rules or by any of USAC's printed policies. Specifically, during the last two funding years, after HCCA had submitted the

Form 474, USAC requested supporting documentation for each Form 474 for each of its more than 100 customers, including:

- Service Certification Forms
- Check numbers and amount of payment to HCCA
- Photocopied checks (Funding Year 2008-2009 only)
- Proof that the school representative who filled out a given Service Certification Form actually signed it and was authorized to do so
- Copies of bank statements and account information from HCCA
- Copies of bank statements and account information from the Billed Entities (Funding Year 2008-2009 only)

USAC routinely requests that the schools return this information within seven or fewer calendar days. The schools, not HCCA, hold much of the requested information, and there is no basis for HCCA to have access to such information. As a result, upon receipt of a USAC request for additional information, HCCA must contact each and every billed entity in an attempt to ensure that the school provides the documentation to USAC or to obtain the documentation from the school so that HCCA may provide the same to USAC directly.

Even when HCCA has tried to address USAC's concerns in advance to expedite the process, it has backfired. One year, attempting to be proactive in responding to USAC's demands, HCCA asked its customers to fill out the Service Certification Forms and return them to HCCA, which submitted them directly to USAC.<sup>1</sup> USAC responded by calling the school representative signatories of the Forms to ensure that they, in fact, had signed the Forms. In some instances, USAC made the schools resend the forms or complete entirely new forms.

In the past, HCCA has been denied funding unless it provided the requested additional information. In the event of such denials, HCCA staff had to submit all new Form 474s and start

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<sup>1</sup> Prior to sending the certification forms to the schools, HCCA staff had to manually add the service dates to each form and marked with an "X" the areas that the school had to complete. This was done on *every one* of the over 100 forms HCCA had sent. Each certification form was emailed to the E-Rate contact person at the school via an individual email, and copies of HCCA invoices also were attached to each email.

the process over again. As explained above, since USAC first imposed these requirements, HCCA has tried to obtain the requested information prior to submitting the Form 474. To do so, HCCA has had to completely change its billing practices. To ensure that the schools had paid and would be prepared to provide the documentation requested within the short timelines given by USAC, HCCA had to continuously monitor the status of all payments from schools. HCCA also had to send second and third notices of invoices to some of its customers, in order to ensure payments were made before HCCA filed its Form 474s.

Gathering all of this information is time consuming, and HCCA only has one employee, its manager of IT operations, Susan Patrick, to respond to requests. The extraordinary scope of her duties is detailed in her Declaration, attached as Exhibit B.

Nonetheless, in the last 18 months, Ms. Patrick had to field between 3 and 8 email and/or phone exchanges with *every one* of HCCA's over 100 customers and sent nearly 800 emails to ensure that USAC received responses to all of its documentation requests.<sup>2</sup> With the additional requirements USAC imposed in the last 18 months, Ms. Patrick is doing the job of at least two full-time employees.

Despite the absence of any requirement that HCCA provide the requested documentation to USAC, HCCA has endeavored in good faith to comply with each and every document request for each of its 106 clients. Despite the extraordinary challenges, HCCA generally has responded to these requests in a timely manner and has made a good faith effort to comply with all filing deadlines while providing all of this additional information.

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<sup>2</sup> These communications included responses to questions from the school about the certification form, requests of verification that the school had received the form, requests of verification that the school had sent the form to the SLD, reminders of relevant deadlines, discussion of extension requests and, notifications to the school of non-compliance with providing the information. Because of the volume of these exchanges, it was not practical to include them in this pleading, but they are available if needed by the Commission.

The present situation resulted from HCCA's attempts to comply with USAC's invasive documentation requests. In the weeks leading up to the October 28, 2010, deadline, HCCA staff was busy with E-Rate requirements. In addition to her regular job duties, Ms. Patrick was busy fielding E-Rate questions from customers and their consultants and following up with schools on payment issues, as well as checking online BEAR forms and fielding phone calls from USAC staff regarding individual applications.

Before November 2010, HCCA submitted Form 474s for approximately 100 schools. Before filing any of these Form 474s, HCCA gathered extensive documentation in anticipation of USAC's extensive requests, including bills, checks, service certifications and banking information. Because HCCA was required to comply with all document requests, it was 5-6 days late in filing the Form 474s for the FRNs.<sup>3</sup> By letter dated November 4, 2010, USAC denied funding for the FRNs at issue. In the cursory denial, USAC merely stated that the Form 474s were due on October 28, 2010, but that USAC had not received them until November 2 and 3, respectively. As already noted, HCCA was late in filing these Form 474s because of USAC's extensive documentation and authorization requirements of USAC.

## **II. GOOD CAUSE EXISTS TO GRANT THE REQUESTED WAIVER**

Good cause exists to grant HCCA a waiver of the Form 474 filing deadline in this proceeding. Section 1.3 of the Commission's rules states that the "provisions of this chapter may be ... waived for good cause shown, in whole or in part, at any time by the Commission...."<sup>4</sup>

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<sup>3</sup> Ironically, even USAC was unable to keep up with its own numerous requests. On November 5, 2010, *one day after it had rejected HCCA's Form 474s*, USAC sent an email to HCCA requesting additional documentation for some of the subject FRNs. See PIA request, re invoice number 1413837 (attached as Exhibit C).

<sup>4</sup> In *Requests for Review of Decisions of the Universal Service Administrator by Alton Community Unit School District 11, et al., Schools and Libraries Universal Service Support Mechanism*, 25 FCC Rcd 7089 (2010), the Commission granted petitioners' requests to waive

Specifically in the present context, the Commission has found that good cause exists to grant a waiver of the Form 474 filing deadline if the applicant has made a good faith effort to comply with the Commission's rules.<sup>5</sup> As demonstrated above, that was clearly the case with HCCA.

In a similar vein, the Commission previously has held that a missed Form 474 deadline is a procedural issue, not a rule violation,<sup>6</sup> and has granted waivers of other late-filed Form 474s. In doing so, the Commission repeatedly has held that administrative and procedural mistakes do not "warrant the complete rejection of ... E-rate applications."<sup>7</sup> Here, it is clear that HCCA committed a mere procedural mistake—not a substantive rule violation—by filing the Form 474s a few days late. The bottom line is that as a result of the time commitment that HCCA had been devoting to responding to numerous USAC requests, HCCA simply ran out of time to complete

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the Form 472 and Form 474 filing deadlines, finding that the petitioners had made a good faith effort to comply with the Commission's rules. In that case, the Commission noted that the applicants had filed the forms late due to billing errors, difficulty in calculating discount level, and simple failure to fax the entire form, among other reasons. In granting a waiver of the Commission's rules, the Commission found that a late-filed Form 474 is a purely administrative matter and does not constitute a substantive rule violation. The Commission also found that inadvertent errors in submitting Form 474s did not warrant rejection of the reimbursement requests of providers serving schools and libraries.

Similarly, in *Requests for Review of Decisions of the Universal Service Administrator by Canon-McMillan School District, Schools and Libraries Universal Service Support Mechanism*, 23 FCC Rcd 15555 (2008), the Commission found that "staff changes or inadvertent errors or typographical errors by the applicant's staff" resulted in forms 472 and 474 not being filed on a timely basis. The Commission found that good cause existed to grant each of these appeals. In reaching that conclusion, the Commission stated that "petitioners have demonstrated that they made good faith efforts to comply with programmatic rules." The Commission also emphasized that applicants "missed a procedural deadline and did not violate a substantive rule."

<sup>5</sup> *Id.*

<sup>6</sup> *Alton, supra*, ¶ 6.

<sup>7</sup> *Request for Review of the Decision of the Universal Service Administrator by Bishop Perry Middle School, et al., Schools and Libraries Universal Service Support Mechanism*, 21 FCC Rcd 5316, ¶ 11 (2006).

the Form 474s on time. As soon as HCCA realized its error, it submitted the Form 474s to USAC.

In light of the foregoing, granting HCCA's waiver request is consistent with Commission precedent because HCCA repeatedly has made a good faith effort to comply with the Commission's rules, and because its late filing of the subject forms was inadvertent, caused by the considerable amount of time it had to devote to responding to USAC's requests for additional information pertaining to previously submitted Form 474s.<sup>8</sup>

HCCA requests that the Commission overlook this ministerial and inadvertent error caused by HCCA's inability to provide both the Forms and the voluminous information requested by USAC in the timelines required, and accept the late-filed Form 474. Denying HCCA funding *for services that it already has provided* would be contrary to the public interest, and would have a substantial unwarranted financial impact on this small-chartered institution. Funding these applications, for services provided by a state-funded service provider created to further the technology goals of the state of Ohio, and thus benefitting Ohio schools, is indisputably in the public interest.

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<sup>8</sup> Specifically, as detailed in Ms. Patrick's attached Declaration, in October, HCCA was in the process of both (i) responding to numerous, onerous requests—outside of any Commission rule requirement—for additional information from USAC, and (ii) requesting and coordinating responses from the schools HCCA serves. As a state-funded entity with limited resources, HCCA does not have a full-time staff member devoted to E-Rate matters. Like many smaller entities, HCCA has one employee whose E-Rate responsibilities are in addition to substantial other responsibilities. Ms Patrick devotes a substantial amount of time to: managing the IT Help Desk for HCCA; administering its Windows local area network; coordinating its HCCA's web-based internet, intranet and extranet presence.; coordinating and approving training requests to ensure appropriate staff development; approving vacation, sick leave and other absences; coordinating day-to-day activities of the IT Analyst team and overseeing their duties, including, but not limited to: daily backups, Security updates on internal servers, DNS requests, Firewall configuration requests, Web Hosting requests, DHCP requests, Filter requests, Support/training for HCCA staff, Printer support to HCCA schools and to HCCA staff, exchange support to HCCA hosted schools and HCCA staff, and contract administration.

### **III. THE COMMISSION SHOULD ORDER USAC TO STOP REQUESTING UNNECESSARY INFORMATION FROM HCCA**

The Commission should order USAC to cease its harassing and unnecessary information requests, because these requests threaten to make the E-Rate program unworkable for HCCA, and presumably for others as well. USAC has requested, for each of its over 100 customers: (i) Service Certification Forms; (ii) photocopied checks; (iii) proof that the school representative who filled out a given Service Certification Form actually signed it and was authorized to do so; (iv) copies of bank statements and account information from HCCA; and (v) copies of bank statements and account information from the Billed Entities. Any one of these documents should suffice to show either the date the billed entity intended to pay its non-discounted share of the services or the date it paid; yet USAC demanded all of them. USAC's belt-and-suspenders approach serves no purpose and goes well beyond its obligation to prevent waste fraud and abuse.

As shown above, HCCA devoted substantial administrative time and effort to respond to each and every one of USAC's requests. In many instances, this information was not within HCCA's possession, and HCCA had to contact each and every school in an attempt to secure the requested documentation and to provide the same to USAC. Even after HCCA submitted the information to USAC, USAC made multiple follow-up requests to HCCA—not the schools themselves—asking if the school representative who filled out a given Service Certification was authorized to do so without explaining why such additional information was needed.

The additional information USAC repeatedly and persistently has requested of HCCA is neither required under the Commission's rules, nor are they necessary to prevent waste fraud and abuse. According to USAC, the information that it requested is necessary to determine whether individual applicants had tendered payment to HCCA for the services rendered and whether



HCCA had deposited payment into its checking accounts. However, although the Commission's rules require that billed entities pay the non-discounted share of E-Rate services,<sup>9</sup> no Commission rule or decision requires a service provider to prove that it has received payment from the billed entity prior to seeking reimbursement. Indeed, service providers are not required by the Commission's rules to show proof of payment to receive reimbursement, nor are they required to certify or prove payment on the Form 474. It is also not a prerequisite, under the Commission's rules, for Billed Entities to have paid in advance of the filing of the Form 474.

USAC's conduct has caused harm to HCCA. Because the HCCA person designated to handle E-Rate invoicing issues was diligently attempting to respond to USAC's burdensome, almost abusive document requests (largely for irrelevant information), HCCA inadvertently submitted the Form 474s at issue five days late. Moreover, USAC also demanded, in the course of its investigations, that HCCA demonstrate proof of payment from each school *before* it would issue a reimbursement to HCCA, even though service providers are eligible to receive reimbursement *before* applicants pay for the services provided.<sup>10</sup> To meet this requirement, HCCA was forced to change its billing practices and to hound its customers to pay their bills early so that HCCA and the schools would be prepared to respond to USAC's demands in USAC's contracted timeline. In short, HCCA's business practices have been overhauled and its human resources stretched to the limit just to meet USAC's arbitrary and baseless demands. The

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<sup>9</sup> See *Request for Review of a Decision of the Universal Service Administrator by Iosco Regional Educational Service Agency, Schools and Libraries Universal Service Support Mechanism*, 24 FCC Rcd. 12735 (2009).

<sup>10</sup> Indeed, USAC's publications also allow service providers to file Form 474s before they are paid by the E-rate applicants they serve. USAC's website states that a service provider can file a Form 474 *either* "After the billed entity submits the Receipt of Service Confirmation Form (Form 486) verifying the service start date [or] [a]fter the service provider has provided a discounted bill to the billed entity." Nowhere on the USAC website does it state that the applicant must actually pay its bill before a Form 474 can be submitted.


Commission should order USAC to stop making these unnecessary information requests and, thereby, stop interrupting the business of HCCA and its customers – the schools of Ohio.

#### **IV. RELIEF REQUESTED**

For the foregoing reasons, Hamilton/Clermont Cooperative Association respectfully requests that the Commission (i) reverse USAC's denial of funding, (ii) waive the Form 474 filing deadlines for the subject FRNs, (iii) order USAC to fund the entire amount requested by HCCA, and (iv) direct USAC to discontinue its abusive invoicing questioning of HCCA.

Respectfully Requested,

HAMILTON/CLERMONT COOPERATIVE  
ASSOCIATION

By:   
Mark Palchick  
Sarah Miller

**Womble Carlyle Sandridge & Rice, PLLC**  
1401 I Street, N.W., Seventh Floor  
Washington, D.C. 20005  
(202) 857-4400  
(202) 467-6910 (fax)

January 4, 2011

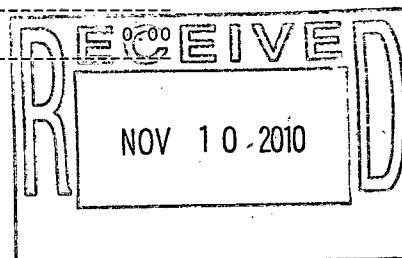
## EXHIBIT A

0143024403 0000 143024403 BP0 1N0000 ML1 IH0000 AL01  
Hamilton Clermont Cooperative Association  
ATTN : Al Porter  
11083 Hamilton Avenue  
Cincinnati OH 45231

SPIN # 143024403 USAC REFERENCE # C000425766

STATEMENT DATE 11/04/2010

11/04/2010	143024403 1856721	hcca-2009-2010-lock-nor	0.00
	SLD Invoice Number:1413837;Line Item Detail Number: 4719739;Amount Requested:10125.00;Invoice Received Date [11/02/2010] Later Than Invoice Acceptable End Date [10/28/2010];12;		
11/04/2010	143024403 1856675	hcca-2009-2010-lock-nor	0.00
	SLD Invoice Number:1413837;Line Item Detail Number: 4719743;Amount Requested:32341.87;Invoice Received Date [11/02/2010] Later Than Invoice Acceptable End Date [10/28/2010];12;		
11/04/2010	143024403 1781381	hcca-2009-2010-lock-nor	0.00
	SLD Invoice Number:1413837;Line Item Detail Number: 4719778;Amount Requested:4050.00;Invoice Received Date [11/02/2010] Later Than Invoice Acceptable End Date [10/28/2010];12;		
11/04/2010	143024403 1901218	hcca-2009-2010-lock-nor	0.00
	SLD Invoice Number:1413837;Line Item Detail Number: 4719794;Amount Requested:3360.00;Billed Date before [07/01/2009] of Fund Yr;33;Bill Dt prior to (486) Actual Start Date;38;Billed Date Before 486 Service-Start Date;229;Billed Date Outside of Funding Year;285;		
11/04/2010	143024403 1783340	hcca-2009-2010-intac-stberntt	0.00
	SLD Invoice Number:1414977;Line Item Detail Number: 4722219;Amount Requested:1190.20;Invoice Received Date [11/03/2010] Later Than Invoice Acceptable End Date [10/28/2010];12;		



## EXHIBIT B

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Request for Review of the	)	
	)	
Decision of the	)	<b>CC Docket No. 02-6</b>
Universal Service Administrative Company	)	<b>CC Docket No. 96-45</b>
	)	
By	)	<b>File No. _____</b>
	)	
Hamilton/Clermont Cooperative Association	)	
SPIN # 143024403	)	
Form 474 Invoice # 1414977 and 1413837	)	
Funding Request # 1796279, 1783340,	)	
<u>1856721, 1856675, 1781381, 1901218</u>	)	

**DECLARATION OF SUSAN PATRICK**

I, Susan Patrick, state as follows:

1. I have personal knowledge of the matters set forth in this Declaration.
2. I am over the age of eighteen.
3. I am the manager of IT operations at Hamilton/Clermont Cooperative Association ("HCCA") and have been at all times relevant to this matter.
4. In this capacity, I have a wide range of day-to-day responsibilities. Among other matters, I am responsible for providing daily IT support to users and ensuring that all HCCA equipment is operational to provide access for HCCA users and employees. I manage the IT Help Desk for HCCA and represent HCCA at Help Desk state meetings. I also administer the Windows local area network, and I coordinate HCCA's web-based internet, intranet and extranet presence.

5. I work closely with the engineering department to implement and maintain new services and software. I often help with projects initiated by the Engineering team.

6. I hold a managerial position within HCCA, so I coordinate and approve training requests to ensure appropriate staff development. I also approve vacation, sick leave and other absences. I also coordinate day-to-day activities/responsibilities of the IT Analyst team overseeing their duties, including, but not limited to:

- Daily backups
- Security updates on internal servers
- DNS requests
- Firewall configuration requests
- Web Hosting requests
- DHCP requests
- Filter requests
- Support/training for HCCA staff
- Printer support to HCCA schools and to HCCA staff
- Exchange support to HCCA hosted schools and HCCA staff
- Contract administration

7. In addition to all of my other duties, I coordinate and manage our E-Rate filings including the submission of Form 474s to USAC.

8. For the past two funding years, after receiving the Form 474, USAC has asked for the following documentation for each school:

- Service Certification Forms
- Check numbers and dates they were submitted to pay for E-Rate services
- Photocopied checks (required for Jan. 2009 through June 2009 only)
- Copies of bank statements and account information from HCCA
- Copies of bank statements and account information from the Billed Entities.

9. I also know that USAC requested proof from many of the schools that the school representative who filled out a given Service Certification Form actually signed it and was authorized to do so.

10. USAC has denied funding in the past if we did not provide all of this documentation within their deadlines. Then, I had to resubmit a Form 474 for each denied invoice and start the process all over again.

11. USAC staff represented to me that this documentation was necessary to show that the billed entities had paid their non-discounted share of E-Rate services.

12. In the second half of Funding Year 2008-2009, we attempted to gather and submit some of the documentation we knew USAC was going to demand. I sent Service Certification Forms to each of our customers and asked them to fill them out. Then, after reviewing them to make sure they were complete, we submitted those to USAC. USAC responded by calling most, if not all, of the school representative signatories of the Forms to ensure that they had, in fact, signed the Forms. USAC made some of the schools resend the forms or complete entirely new forms.

13. To ensure that the schools had paid and would be prepared to provide the documentation requested within the short timelines given by USAC, we had to continuously monitor the status of all payments from schools, contacting our fiscal agent multiple times a week. We also sent out multiple invoices to ensure our customers paid their invoices early so that we could provide HCCA with copies of their checks.

14. In the last 18 months, I have sent nearly 800 written communications to address USAC's invoicing requirements. I have also fielded an average of 3 to 8 calls and/or e-mails with *each* individual school to coordinate responses to USAC's document requests.

15. We were late filing the Form 474s for the above-named FRNS, because we were so busy trying to respond to USAC's document requests. I, for one, was busy responding to E-Rate questions from customers and their consultants and following up with schools on



payment issues in October. I was also checking online BEAR forms two to three times a week.

I was also fielding phone calls from USAC staff regarding individual applications.

16. I have reviewed the pleading and it is true and accurate to the best of my knowledge.

17. This concludes my declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: January 4, 2011

Susan Patrick  
Susan Patrick

## EXHIBIT C

**From:** Knowlton, Eric [EKNOWLT@sl.universalservice.org]  
**Sent:** Friday, November 05, 2010 3:46 PM  
**To:** Susan Patrick  
**Subject:** RE: E Rate Invoice hcca-2009-2010-locl-nor Our Invoice 1413837

I believe the invoice I have is only for half of the year. I'm not sure which half but maybe you can based on your invoice number. I don't have anything for the other districts, they may have gone to someone else. Thanks

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**From:** Susan Patrick [mailto:Susan@mail.hccanet.org]  
**Sent:** Friday, November 05, 2010 3:14 PM  
**To:** Knowlton, Eric  
**Subject:** RE: E Rate Invoice hcca-2009-2010-locl-nor Our Invoice 1413837

Eric,

This district, East End, is billed semi-annually but you sent only 1 certification form. Which invoice do you want a copy of – the first half of the year (January invoice) or the second half of the year (April invoice)?

There were also 2 other districts included on this filing. Will I be receiving certification forms for them as well?

Thanks.

Susan

**Susan Patrick**  
HCCA - Manager IT Operations  
7615 Harrison Avenue  
Cincinnati, Ohio 45231  
Direct Line - 513.728.7913  
E-Fax - 513.728.7982

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**From:** PIAInvoicing [mailto:PIAInvoicing@sl.universalservice.org]  
**Sent:** Friday, November 05, 2010 2:55 PM  
**To:** Susan Patrick  
**Cc:** Susan Patrick@1-513-728-7982  
**Subject:** E Rate Invoice hcca-2009-2010-locl-nor Our Invoice 1413837

Ms. Patrick,

Applicant Name: EAST END COMMUNITY HERITAGE SCHOOL  
Service Provider (SP) Name: Hamilton Clermont Cooperative Association of Boards of Ed  
Submitter Invoice Number: hcca-2009-2010-locl-nor  
SLD Invoice Number: 1413837  
Funding Request Number (FRN): 1901218

I am reviewing your request for reimbursement of the aforementioned FRN. Please send me a copy of the detailed invoices sent to the applicant for the products/services provided.

Please provide the page(s) that indicate the following:

- Bill Date / Ship Date

- Service Provider Name
- Total Current Charge
- Bill-To Entity ( Name & Address )
- Description of Products/Services Delivered

In addition to a copy of the detailed invoice, please provide the attached Service Certification form, to be completed by the applicant, for the products/services provided. The applicant must complete **ALL** 6 lines of the attached form (Please note: Due to audit requirements, the re-submittal of old Service Certification forms is not acceptable and will result in rejection of the associated invoice line(s)):

- Representative / Contact Name
- Representative / Contact Title
- Representative / Contact Phone
- Date Goods/Services Delivered
- Date Goods/Services were or will be Installed
- Date Applicant Portion Paid and Check No. or Date to be Paid

The applicant must also **sign and date** the form, and indicate **Yes or No** as appropriate, in one of the two appropriate sections at the bottom of the form.

**If the signatory is any other than the Representative/Contact identified on the form, please provide the full Name, Title and Phone Number along with the documents.**

The applicant may fax/e-mail the above information to me directly, which may speed up the review process. Please include the SLD Invoice Number on the fax/e-mail cover sheet so I can match your fax/e-mail to your form. For fax submissions, the cover sheet must identify the organization and the name/title/signature of the sender in addition to the SLD Invoice Number.

Please provide this information to me as soon as possible within the next 7 calendar days (by **End of Day** Friday, 11/12/10). Failure to do so may result in a reduction or rejection of the invoice, without further request. In this event, please ensure you have all necessary documents collected before resubmitting your request. If you have any questions, please contact me within this 7 day period.

Thank you for your cooperation and continued support of the Universal Service Program.

Eric Knowlton  
Schools and Libraries  
P-(973) 581-5357  
F-(973) 599-6539  
[eknowlt@sl.universalservice.org](mailto:eknowlt@sl.universalservice.org)

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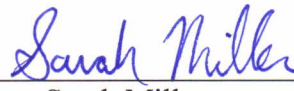
## CERTIFICATE OF SERVICE

I, Sarah Miller, hereby declare that copies of the foregoing request for review were delivered by U.S. mail or by e-mail, this day, January 4, 2011, to the following, as required by section 54.721(c) of the Commission's rules:

David Capozzi  
Acting General Counsel  
Universal Service Administrative Company  
2000 L Street, N.W., Suite 200  
Washington, D.C. 20036

Gina Spade  
Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Letter of Appeal  
Schools and Libraries Division – Correspondence Unit  
100 S. Jefferson Rd  
P.O. Box 902  
Whippany, NJ 07981

  
\_\_\_\_\_  
Sarah Miller